

EXHIBIT E

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By Email and First Class Mail
April 16, 2018

Sean P. Carter, Esquire
Scott Tarbutton, Esquire
Cozen O'Connor, P.C.
1650 Market Place
Philadelphia, PA 19103-7301

Re: In re Terrorist Attacks, No. 03-MDL-1570

Dear Counsel:

I write on behalf of the Defendants Dr. Abdullah Al-Turki, Dr. Abdullah Al-Obaid, Dr. Abdullah Naseef, and Dr. Adnan Basha, in response to the queries that plaintiffs' counsel raised during the discovery conference call on April 11, 2018.

First, Dr. Naseef remains hospitalized and is not able to sit for a deposition. I will let you know if his health improves to the point where he would be able to sit for a deposition.

Second, Drs. Al-Turki, Al-Obaid, and Basha would have to be deposed by videoconferencing from Saudi Arabia, and would require an Arabic translator. We can work with you to identify a suitable office location in Saudi Arabia for the videoconferencing, which will save the plaintiffs the substantial travel expenses of taking depositions in Western Europe.

As plaintiffs had previously indicated that they did not want to depose these individuals until after the motions to compel were resolved as to the charity organizations, I had assumed that plaintiffs were waiting for that to be addressed. Under the Deposition Protocol Order, ¶ 38 (ECF No. 3894), each of these individuals "will only be deposed once," so that the single deposition of each will serve as both a deposition in their capacity as individual defendants (for jurisdictional purposes), and a deposition in their capacity as a former officer of the MWL or IIRO (for merits discovery as to the charities).

Also, these individual defendants do not presently anticipate noticing depositions of other witnesses, although they may participate in depositions noticed by other parties.

Sean P. Carter, Esquire
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Finally, as I had previously mentioned (and as counsel for another defendant has mentioned with respect to its client), these individuals will not be able to sit for a deposition during Ramadan (May 16 to June 14 this year), as the fasting requirements would render them exhausted or otherwise not fully able to concentrate. As I will be out of town the week following Ramadan (for a family member's memorial service), it appears that these depositions could be scheduled starting sometime in July 2018.

Sincerely,

/s/ Alan

Alan R. Kabat

cc: MDL 1570 counsel